



**BACKCOUNTRY
HUNTERS & ANGLERS**
WASHINGTON

Washington Fish & Wildlife Commission
600 Capital Way N.
Olympia, WA 98501

December 6, 2023

Re: Petition to Begin Rulemaking Regarding Black Bear and Cougar Rulemaking

To the Honorable Members of the Fish and Wildlife Commission,

Backcountry Hunters & Anglers is a non-profit conservation organization which seeks to ensure North America's outdoor heritage of hunting and fishing in a natural setting, through education and work on behalf of wild public lands, waters, and wildlife. In Washington, we are proud of our history working effectively with private industry, Indigenous tribes, and environmental organizations to advance the mission and values of the Department of Fish and Wildlife (Department).

On behalf of the Board, members and volunteers of the Washington Chapter, we humbly request that the Commission does not vote to approve the **Petition to Begin Rulemaking Regarding Black Bears and Cougars**. While we recognize the petitioners are unreservedly invested in their efforts, we believe action on this matter would be short-sighted and disadvantageous at this time. The supporting documentation referenced by the petitioners, including the Peebles Study which failed peer-review, do not reflect the best available science and have been challenged by department staff as inaccurate and inconclusive. Advancing this proposal may recklessly harm wildlife populations while reducing opportunity in a manner that does not have diverse stakeholder support or critical data from Department scientists.

The Commission has long-sought better data to inform their decisions, particularly as it relates to predators and carnivore species, including black bears and cougars. Currently, the Department is preparing for a scientific review and presentation of the available data on these species in response to Commission requests in the lead up to pending rulemaking for the game management plan. We believe that if changes are needed in management and opportunity regarding black bears and cougars, the only appropriate time to do so would be after the Department's presentations and in alignment with their recommendations in your predetermined schedule. At that time, we respectfully offer to engage the Commission or Department in any way which may improve practices, policies, or outreach to the benefit of all stakeholders and affected species.

We believe that the Commission has set a course of action regarding black bears and cougars that reflects good governance, consistent application of policymaking, stakeholder engagement, and reliance on the scientific products of Department professionals. We encourage you to continue this



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work and reject the Petition to Begin Rulemaking for Black Bears and Cougars. Doing so would strengthen employee morale, build stakeholder trust, and incorporate qualitative data set to be provided on an already established timeline.

The Washington Chapter of Backcountry Hunters and Anglers does not make a habit of engaging in citizen petitions to the Commission, and to date, has only co-signed onto one in our history. We believe that it is more productive and beneficial to engage in dialogue, build bridges, and find mutually beneficial opportunities to advance the mandate of the Commission and Department for the benefit of our State and its natural resources. We hope that in rejecting this petition and continuing forward on your current trajectory regarding black bears and cougars, that the Chapter will be able to return to the table and work collaboratively on these matters at the appropriate juncture.

Thank you for your consideration and significant efforts on behalf of Washington's wildlife and public lands.

Respectfully,

Cameron Lankhaar, Co-Chair
Washington Chapter
Backcountry Hunters & Anglers

Dan Wilson, Co-Chair
Washington Chapter
Backcountry Hunters & Anglers

